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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LUCERO SANCHEZ,

Plaintiff,

vs.

RENOWN HEALTH, a non-profit Nevada  
Corporation, and DOES 1-20, inclusive,

Defendant

Case No.: 3:21-cv-00352-MMD-CSD

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME  
TO FILE JOINT PRETRIAL ORDER**

**[SECOND REQUEST]**

Plaintiff Lucero Sanchez and Defendant Renown Health (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree that the deadline to file the Joint Pretrial Order (“JPTO”), which is currently set for June 10, 2024, be extended for a period of sixty (60) days until Friday, August 9, 2024, due to recent developments in this case described more fully below.

The Parties and their counsel attended a settlement conference on April 10, 2024, but were unable to resolve the case. Thereafter, counsel for the Parties began diligently reviewing the file to confer and prepare the JPTO. While doing so, defense counsel identified a discrepancy in the diaries produced by Plaintiff in this action. Defense counsel promptly notified Plaintiff’s counsel of the discrepancy after the close of business on May 22, 2024. Counsel for the parties briefly discussed the issue by phone the following morning and Plaintiff’s counsel filed a Motion to

1 Withdraw as Counsel later that day. (ECF No. 92). A hearing regarding the Motion to Withdraw  
 2 as Counsel is scheduled before Magistrate Judge Denney on June 7, 2024. (ECF No. 95).

3 Plaintiff's counsel has represented to the Court that a fundamental breakdown in the  
 4 attorney/client relationship has necessitated his request to withdraw as counsel in this case.  
 5 Plaintiff's counsel has also denied having any knowledge that different versions of Plaintiff's diary  
 6 existed. Plaintiff is expected to attend the hearing on June 7, 2024. However, her position and/or  
 7 explanation regarding the existence of different versions of her diary is known only to her counsel  
 8 at this time and protected from disclosure by the attorney-client privilege. Given the unknown  
 9 circumstances of how different versions of Plaintiff's diaries were created and/or produced in this  
 10 case, Defendant intends to oppose the Motion to Withdraw as Counsel and move for sanctions.  
 11 Therefore, the results of the hearing regarding the Motion to Withdraw as Counsel are uncertain.

12 In light of these unusual developments, including the potential need for Plaintiff to secure  
 13 new counsel to try the case, the Parties request a 60-day extension up to and including August 9,  
 14 2024, by which to prepare and file the JPTO. This stipulation is made in good faith and not for  
 15 purposes of delay.

16 Dated: June 4, 2024

Dated: June 4, 2024

17  
 18 /s/ Luke Busby

19 LUKE BUSBY, ESQ.  
 20 316 California Ave., #82  
 21 Reno, NV 89509

*Counsel for Plaintiff*

/s/ Sandra Ketner

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 Reno, Nevada 89511

*Counsel for Defendant, Renown Health*

## 22 ORDER

23 **IT IS SO ORDERED.**

24 Dated this \_\_\_\_\_ day of \_\_\_\_\_ 2024.

25  
 26 \_\_\_\_\_  
 27 U.S. District/Magistrate Judge